

Northwest Landowners Association
Comments to NDIC Division of Mineral Resources
July 31 2020



ND Industrial Commission
Division of Mineral Resources
Lynn Helms, Director
100 E Calgary Ave
Bismarck, ND 58501
Via Email to: brkadrmas@nd.gov

Re: July 31st Confiscation Hearing Testimony of Northwest Landowners Association in Case No. 28530

Dear Division of Mineral Resources:

My name is Troy Coons, and I am the Chairman of the Northwest Landowners Association. Northwest Landowners Association represents over 575 farmers, ranchers, and property owners in North Dakota. Thank you for the opportunity to provide comments on case number 28530, in regards to confiscating oil wells. Some of the wells slated for confiscation are directly on NWLA members' land. Because this action will have the greatest impact on North Dakota's landowners and will affect multiple NWLA members directly, we urge the NDIC to carefully and completely reclaim these sites to original condition. Land in North Dakota is our State's greatest asset and the foundation for the livelihood of so many North Dakotans. Simply plugging the wells is not enough; reclamation to restore the land's productivity is imperative. Additionally, many of these old well sites have had produced water spills and still have contamination, so the expense of reclamation will be more significant for those sites.

NWLA has stated for years that bonding is inadequate. If the industry or this commission believes that adequate bonding is not the answer to ensuring that landowners are not left holding the bag, then it is time to find a different solution. NWLA is willing to sit down with the commission and work together prior to the 2021 Legislative Session to work on solutions. It is well-known that the oil industry is an extremely cyclical business. Oil booms happen, and so do busts. Planning for both is required.

Thank you for the opportunity to provide comments on this important issue. NWLA looks forward to continuing to advocate on these issues and requests that NDIC keep the public updated on the status of each of the wells on the confiscation list. Additionally, NWLA intends to independently track progress at as many of these sites as possible, including independent sampling and testing.

Sincerely,

Northwest Landowners Association
Troy Coons, Chairman

A handwritten signature in black ink, appearing to read 'Troy Coons', located below the printed name.